

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Susan A. Long, Esq. Jaclynn N. McDonnell, Esq. dstolz@genovaburns.com dclarke@genovaburns.com slong@genovaburns.com jmcdonnell@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 533-0777 Fax: (973) 814-4045 <i>Proposed Local Counsel for the Official Committee of Unsecured Creditors</i>	BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Jeffrey L. Jonas, Esq. rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com jjonas@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 Eric R. Goodman, Esq. 601 Thirteenth Street NW Suite 600 Washington, DC 20005 Tel: (202) 536-1740 egoodman@brownrudnick.com <i>Proposed Counsel for the Official Committee of Unsecured Creditors</i>
In re: POWIN, LLC, <i>et al.</i> , ¹ Debtor.	Chapter 11 Case No.: 25-16137 (MBK) (Jointly Administered) Re: Docket Nos. 180, 282, 286, 294, 341

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF POWIN, LLC, ET AL. TO THE DEBTORS' OBJECTION TO MAINFREIGHT INC.'S
MOTION TO CONFIRM THAT THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(A)
DOES NOT APPLY TO CERTAIN GOODS IN ITS POSSESSION**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc. [9926]; (xi) Powin Energy Ontario Storage II LP [5787]; (xii) Powin Canada B.C. Ltd. [2239]. The Debtors' mailing address is 20550 SW 115th Avenue, Tualatin, OR 97062.

The official committee of unsecured creditors (the “Committee”) of Powin, LLC and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby submits this joinder (the “Joinder”) to the Debtors’ Objection² to *Mainfreight Inc.’s Motion to Confirm that the Automatic Stay Pursuant to 11 U.S.C. § 362(A) Does Not Apply to Certain Goods in its Possession* (the “Mainfreight Motion”) [Docket No. 180]. In support of the Debtors’ Objection, the Committee respectfully states as follows:

JOINDER

1. The Mainfreight Motion has initiated a three-party dispute over priority as to certain power units and electric components. These goods were supplied to the Debtors by Ace Engineering & Co., Ltd. (“Ace”), were purportedly sold on the eve of bankruptcy to BHER Ravenswood Solar 1, LLC (“BHER”), and remain in Mainfreight Inc.’s (“Mainfreight”) possession. In general, Mainfreight seeks confirmation that, in light of the purported sale to BHER, the goods are beyond the scope of the automatic stay, and as such, Mainfreight may seek to attach and enforce a possessory lien in respect of the amounts it alleges are owed to it by the Debtors. Both Ace and BHER have filed objections³ to the Mainfreight Motion, asserting competing priority interests in the goods.

2. The Debtors, through their Objection, do not take a position on the merits with respect to this dispute. Instead, the Debtors request adjournment of this Court’s consideration of the Mainfreight Motion until the August 6 hearing to allow for negotiations on a comprehensive resolution. The Committee similarly does not, at this time, take a formal position on the merits, and under the circumstances of this case, has not had time to diligence the merits. The Committee

² The Debtors’ Objection *Mainfreight Inc.’s Motion to Confirm that the Automatic Stay Pursuant to 11 U.S.C. § 362(A) Does Not Apply to Certain Goods in its Possession* (the “Debtors’ Objection”) [Docket No. 294].

³ See Docket Nos. 282 and 286, respectively.

agrees with the Debtors' adjournment request to allow time for negotiations among the parties, which the Committee is hopeful will result in an acceptable resolution without the need for Court intervention, or provide adequate time to investigate the merits of the competing claims of ownership and determine what rights (if any) the estate has in the property at issue. As such, the Committee joins in the Debtors' request for adjournment of the relief requested in the Mainfreight Motion.

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Date: July 14, 2025

/s/ Daniel M. Stolz

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